

# EXHIBIT T

**In the Matter Of:**

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY

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**VIDEOTAPED DEPOSITION OF ROBERT LATHAM, M.D.**

*November 10, 2015*

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NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY  
VIDEOTAPED DEPOSITION OF ROBERT LATHAM, M.D. on 11/10/2015

Pages 22..25

<p style="text-align: right;">Page 22</p> <p>1 Q. Okay.</p> <p>2 A. I've had e-mails about this and we went</p> <p>3 over this publication just in the last, last month.</p> <p>4 Q. Okay. So you cleared this?</p> <p>5 MR. SCHRAMBEK: You can keep it.</p> <p>6 Q (By Mr. Kinnard) You said this is --</p> <p>7 A. Yes.</p> <p>8 Q. And you agree with the contents in this</p> <p>9 article?</p> <p>10 A. Yes, I do.</p> <p>11 Q. Okay. So it has your name there and then</p> <p>12 it has a four next to your name and on the back it</p> <p>13 says --</p> <p>14 A. Saint Thomas Hospital, yes.</p> <p>15 Q. -- Saint Thomas Hospital. Why is that?</p> <p>16 A. Because that's my place of residence as far</p> <p>17 as business goes.</p> <p>18 Q. Okay. Now, did you also conclude that the</p> <p>19 fungal meningitis --</p> <p>20 A. Well, I guess I really should have said</p> <p>21 Saint Thomas West. They will probably get -- I will</p> <p>22 get in trouble for that.</p> <p>23 Q. To be more accurate, it should say</p> <p>24 Saint Thomas Hospital West?</p> <p>25 A. Hospital West. Yes, should have said that</p>	<p style="text-align: right;">Page 24</p> <p>1 fungal meningitis?</p> <p>2 A. We had about 50 some-odd that I took care</p> <p>3 of, yes.</p> <p>4 Q. That's a lot of people, isn't it?</p> <p>5 A. That's -- I guess.</p> <p>6 Q. And those people who suffered fungal</p> <p>7 meningitis had that condition caused by the fact that</p> <p>8 they received contaminated steroids that had been</p> <p>9 manufactured by NECC; is that true?</p> <p>10 A. They came from NECC. I don't know if they</p> <p>11 manufactured them. I don't know what they did.</p> <p>12 Q. Well, they originated from NECC.</p> <p>13 A. As far as I'm -- to my knowledge, that's</p> <p>14 where they came from.</p> <p>15 Q. All right. And the people who had</p> <p>16 undergone epidural steroid injections and had other</p> <p>17 infections that you know about, they, too, got this</p> <p>18 infectious condition they had from the contaminated</p> <p>19 steroids that came from NECC. True?</p> <p>20 A. By that I think you mean the epidural</p> <p>21 abscesses, the osteomyelitis, the soft tissue</p> <p>22 abscesses near the injection sites that those</p> <p>23 patients experienced, and, yes.</p> <p>24 Q. We'll go over those as well.</p> <p>25 Did some people die as a result of getting</p>
<p style="text-align: right;">Page 23</p> <p>1 because we already changed our name by that point.</p> <p>2 Q. Old habits are hard to break.</p> <p>3 A. For old men, yes.</p> <p>4 Q. Anyway, so it's your opinion that the</p> <p>5 fungal meningitis and other infections that these</p> <p>6 patients had following epidural steroid injections</p> <p>7 were caused by the contaminated steroids from NECC;</p> <p>8 is that true?</p> <p>9 MR. SCHRAMBEK: Object to the form.</p> <p>10 Q (By Mr. Kinnard) Is that true?</p> <p>11 A. Yes.</p> <p>12 MR. KINNARD: What in the world is wrong</p> <p>13 that with that question?</p> <p>14 MR. SCHRAMBEK: You said "other infections,"</p> <p>15 and then you said "patients." I have no idea</p> <p>16 who the patients are and what infections you're</p> <p>17 referring to. So it could be one patient had an</p> <p>18 infection that has nothing to do with this, but</p> <p>19 as far as the fungal meningitis, we don't</p> <p>20 dispute that.</p> <p>21 MR. KINNARD: Okay. Thank you. I</p> <p>22 appreciate that.</p> <p>23 MR. SCHRAMBEK: Sure. Yes.</p> <p>24 Q (By Mr. Kinnard) Okay. Did many patients</p> <p>25 who underwent epidural steroid injections develop</p>	<p style="text-align: right;">Page 25</p> <p>1 contaminated steroids that came from NECC?</p> <p>2 A. Yes. As a result of the infection that</p> <p>3 those things produced, yes.</p> <p>4 Q. I'm sorry. Could you say that again?</p> <p>5 A. As the -- they died from the infections</p> <p>6 that receiving those contaminated products produced,</p> <p>7 yes.</p> <p>8 Q. I just didn't hear you. I told you I have</p> <p>9 a hearing problem. I'm sorry. Let me -- okay.</p> <p>10 MR. KINNARD: So everybody can hear this.</p> <p>11 He said: They died from the infections</p> <p>12 receiving -- they died from the infections that</p> <p>13 receiving those contaminated products produced.</p> <p>14 Q (By Mr. Kinnard) Is that what you said?</p> <p>15 A. Yes, it's not very literate, is it?</p> <p>16 Q. Well, first, is that kind of what you said?</p> <p>17 A. That's -- if she said it, that's what I</p> <p>18 said.</p> <p>19 Q. All right. Well, let's see if we can do</p> <p>20 this a little better. I'll help you.</p> <p>21 Did the people who died die because they</p> <p>22 developed infections after receiving contaminated</p> <p>23 products from NECC?</p> <p>24 A. Some, yes.</p> <p>25 Q. Sir?</p>



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